

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

LATOYA BROWN, *et al.*, individually and on
behalf of a class of all others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI, *et al.*,

Defendants.

Civil Action No.
3:17-cv-00347-WHB-LRA

**UNOPPOSED MOTION FOR
FURTHER CONSOLIDATION OF
SUMMARY JUDGMENT
BRIEFING**

Plaintiffs respectfully submit this Motion for further consolidation of briefing on Defendants' summary judgment motions. In support of this Motion, Plaintiffs would show as follows:

1. On April 13, 2018, Magistrate Judge Anderson entered an Order (the "April 13 Order") authorizing Plaintiffs to file a consolidated memorandum of law not exceeding 75 pages in response to Defendants' six motions for summary judgment (the "Initial Rule 56 Motions") that had been filed as of April 10, 2018 (ECF Nos. 209, 211, 218, 220, 222 and 228). The Court further ordered that Plaintiffs' response to Defendants' Initial Rule 56 motions shall be filed on or before May 1, 2018.

2. In the April 13 Order, Magistrate Judge Anderson also directed that Defendants' reply briefing in further support of the Initial Rule 56 Motions shall not exceed 50 pages and shall be filed on or before May 22, 2018.

3. On April 13, 2018, Defendants filed a Motion for Summary Judgment on the Class-Based Claims of Plaintiffs Khadafy Manning and Quinnetta Manning (ECF No. 256) (the "New Rule 56 Motion").

4. Plaintiffs respectfully request that briefing of the New Rule 56 Motion be consolidated with the briefing of the Initial Rule 56 Motions, such that (i) Plaintiffs' response to the New Rule 56 Motion shall be due on or before May 1, 2018; (ii) Plaintiffs may file a consolidated memorandum of law in opposition to the Initial Rule 56 Motions and the New Rule 56 Motion of no more than 95 pages; and (iii) Defendants' reply briefing in further support of the New Rule 56 Motion shall be due on or before May 22, 2018.

5. Plaintiffs' counsel have conferred with counsel for Defendants regarding the requests set forth above. Defendants' counsel informed Plaintiffs that Defendants have no objection to this Motion, provided that the page limit for Defendants' reply briefing is increased to 65 pages.

6. In light of the foregoing, Plaintiffs respectfully submit that good cause exists for the Court to grant Plaintiffs' Motion and enter the proposed Order submitted herewith as an Order of the Court.

Dated: April 24, 2018

By: /s/ Joshua Tom
Joshua Tom

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CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2018, I caused the foregoing **UNOPPOSED MOTION FOR FURTHER CONSOLIDATION OF SUMMARY JUDGMENT BRIEFING** to be electronically filed with the Clerk of the Court using the CM/ECF system, which has generated and delivered electronic notice of filing to all counsel of record who have consented to electronic service.

/s/ Joshua Tom